1   on. Can you turn to page 75, please. I'm sorry,

2   page 72. And if you could review order 770090

3   which is the order at the top of that page and

4   that indicated it fell to manual because the

5   system could not open an order destination file,

6   do you see that?

7   A.   Yes, I do.

8   Q.   Is that a problem with Ameritech's systems?

9   A.   That is a problem with Ameritech's systems, yes.

10 Q.   And would you consider that an error in Ameritech

11 systems?

12 A.   I consider that a bug in the system, yes.

13 Q.   And is that something Ameritech would like to

14 resolve so those orders do not fall to manual?

15 A.   Counsel, I don't know whether or not it has

16 anything to do with the orders falling to manual

17 because on page 75 we have some that were

18 automatically completed with the same indication.

19 But, yes, it is something we definitely would want

20 to resolve.

21 Q.   Can you tell me why there were two orders with

22 that same order process remark and one was

23 processed manually and according to this log one

24 was processed automatically?

25 A.   No, I cannot.

1   Q. Can you tell me, Mr. Rogers, of total CLEC orders

2   submitted to date how many have fallen to manual?

3   A. Total numbers, no, I can't tell you total numbers.

4   Q. Can you tell me total percentages?

5   A. The last percentage I saw was somewhere around 38

6   or so percent. And currently fallen to manual

7   intervention.

8   Q. When I looked at your status order report and

9   counted the numbers inserted -- I'm sorry, the

10   orders inserted between 2/20 and 2/25, I counted a

11   total of 164 that were processed manually which

12   was 44 percent of those orders inserted during

13   that time period. Does that number sound about

14   correct based on your understanding of how

15   Ameritech system works?

16 A. Back in February?

17 Q. From February 20th through February 25th?

18 A. February 20th to what?

19 Q. February 25th.

20 A. I don't see it. I don't remember the weekly or

21   monthly, whatever. I just know the last one I

22   looked at.

23 Q. Can you tell me how many orders for unbundled

24   loops are processed manually?

25 A. All of them. 100 percent.

1   Q.   And do you know does Ameritech have any plan in

2   place right now to allow those orders to be

3   processed automatically?

4   A.   At the current time we're awaiting for long-term

5   number portability because the coordination

6   between requires a lot of manual intervention.

7   Q.   So is your answer at the current time there are no

8   current plans to change or redesign that system so

9   it allows for automatic flow through?

10   A.   Not until the June time frame.

11   Q.   Do you know approximately what time CLECs will be

12   able to place orders for unbundled loops that will

13   flow through automatically?

14   A.   No, I do not.

15   Q.   Mr. Rogers, can you explain for the panel what a

16   865 transaction is?

17   A.   It's the EDI transaction that is the response to

18   an 850 which is a purchase order. It's a firm

19   order confirmation.

20   Q.   And how is that transaction generated?

21   A.   It is trans -- or excuse me -- generated when the

22   Legacy system notifies the MORTEL that an order

23   has been either process completed or has been

24   entered into the system.

25   Q.   Is that transaction automatically generated by the

1   system upon order completion by the system?

2 A.   It is automate -- it should be automatically

3   generated by the Legacy system, yes.

4 Q.   And what time frame elapses from the time that the

5   order is completed in the system to the time that

6   the system generates the 865 completion notice for

7   the CLEC?

8 A.   That I'm not sure.

9 Q.   Do you know what the system is designed, how

10   quickly the system is designed to provide that

11   information to the CLEC?

12 A.   From the time that the actual order is completed

13   to the time that we get the response, no, I don't

14   know.

15 Q.   Would you agree with me that it's important for a

16   CLEC to receive notice of when the system has

17   completed the transaction and so the customer is

18   now indeed the CLEC customer?

19 A.   If the CLEC feels it's important, yes, it is.

20 Q.   As an Ameritech employee processing CLEC

21   transactions, do you feel it's important to

22   provide CLECs with timely notice of order

23   completion so they can properly service their

24   customers?

25 A.   Yes.

68

Q.   Are you aware of a problem in the Ameritech

systems where CLECs were being sent days later

than actual completion?

A.   Yes, I became aware of it last Tuesday.

Q.   Prior to our deposition on Monday when we

discussed this, were you aware of that problem?

A.   No, I was not.

Q.   In connection with your testimony for the

commission here today, did you make any attempt to

review any problem logs that would list problems

including that one and others similar to it?

A.   Prior to filing the testimony or prior to right

now? I did as a result of my Tuesday meeting go

and review all the logs and stuff to see what were

the nature of why were we having this type of

trouble.

Q.   Prior to our discussions at the deposition but in

connection with your preparation of the testimony

that you submitted in this docket did you make any

attempt to review all the problem logs that were

available to you through your organization to

determine if problems like that existed?

A.   I reviewed it with the people who were responsible

for the logs but not the individual logs. I went

to the people responsible for the systems and had

1   them come and look me in the eye and tell me how

2   the systems were working and what type of problems

3   were out there.

4   Q. Did you review a document that's entitled order

5   testing problem log that was produced by Ameritech

6   to the staff in this docket in connection with

7   your testimony?

8   A. Can I see it?

9   Q. Yes. Let me hand you what we'll mark Exhibit No.

10   7.

11   MS. MARSH: I do not believe this

12   contains any customer information or customer

13   phone numbers. If it does, we would be happy to

14   address that and make sure those are redacted.

15   (Exhibit 7 marked.)

16   THE WITNESS: Counsel, this log here I

17   did not review. This was a log, a special purpose

18   or special report that was ran for a data

19   request. It was not one that is used.

20   BY MS. MARSH:

21   Q. So in connection with your testimony and

22   specifically your conclusion that the systems are

23   in a state of operational readiness, you did not

24   review this log or any other log that may have

25   identified order testing problems?

1   A.   No. The only data that I would have reviewed was

2   open issues, not anything to do with any closed

3   issues.

4   Q.   Well, as I read this log, some of them do not

5   appear to be closed. Can you tell me as you sit

6   here today if all items reflected on this log are

7   indeed closed?

8   A.   No, I can't definitively say they are closed, no.

9   Q.   Can you identify this log for the record, Exhibit

10   No. 7, is an Ameritech document entitled order

11   testing problem log-all issues. The run date is

12   2/26/97. The time of the run is 10:05 a.m. Can

13   you tell me if the persons under your supervision

14   generated this log?

15   A.   I would assume they would have had to, yes.

16   Q.   Now I note on the log the problems are prioritized

17   1, 2, 3 or 4. Can you tell the panel what a

18   priority 1 problem is?

19   A.   I can tell that a priority 1, at least from the

20   direction that I have given them that a priority 1

21   should have been only those troubles that require

22   around-the-clock resolution and prohibit a major

23   portion of the application to be available to the

24   CLECs.

25   Q.   Would you consider priority 1 problems or troubles

1   service affecting or customer impacting problems?

2 A.   Yes, I would.

3 Q.   Do you know how many priority 1 troubles are

4   reported on this log?

5 A.   Not in this log, no, I don't. Counsel, when we

6   reviewed a similar log like this with my people

7   and I saw the priorities they had on, not this, it

8   was a much smaller one, just the ones that were

9   available, the difference between the priorities

10   and what I had given was not the ones that they

11   were using. And that was why the discussion came

12   about about what the direction I gave them about

13   what a priority 1 should be. They put a priority

14   1 as the ones they should get to first, and they

15   used definitions that somewhat matched mine.

16 Q.   Let's look at the definitions they used which I

17   hope are still attached to the document. If you

18   look at one of the last pages in the document

19   which indicates the four priority numbers that are

20   used and has a definition of them each. It is the

21   page following page 17 of the open issues log?

22 A.   Okay.

23 Q.   Based on your reading of this log and your

24   understanding of the processes that the people in

25   your organization have in place, is this the

1   definition for the various priorities that were

2   assigned to the problems as they are listed on the

3   log?

4 A. That I'm not sure, Counsel, because I know that

5   they created a log such as this for data

6   requests. And then upon reviewing this we -- not

7   this but conversation with me of what was a

8   priority 1, what was a priority 2, I noted there

9   was some data put together. Whether or not they

10   were -- this was used to create this log or it was

11   done afterwards, I'm not sure.

12 Q. This log and this priority list are Ameritech

13   generated documents, are they not?

14 A. I believe they are, yes.

15 Q. And these documents were generated by persons

16   within the organization; is that correct?

17 A. That is correct.

18 Q. According to the definitions provided in this log,

19   priority 1 trouble is considered customer

20   impacting; is that correct?

21 A. That is correct.

22 Q. Can you tell me if any of the priority 1 problems

23   identified in this log are currently still open?

24 A. Let me review them. Reviewing the log, I don't

25   see any.

1 Q.   I see one. But setting that aside, independently

2   based on your knowledge as the director of

3   Ameritech Information Industry Services in

4   connection with your testimony here today, did you

5   make any independent effort to determine if any

6   priority 1 problems as identified by folks in the

7   organization were still open as of the date you

8   prepared your testimony?

9 A.   When I created the testimony did I go and say are

10   there priority 1s based on the definition that I

11   gave you, no, I did not.

12 Q.   Do you know how many priority 2 problems are

13   listed in this log?

14 A.   No, I do not.

15 Q.   According to the definitions in this log, priority

16   2 problems are identified as bugs that do impact

17   specific orders, do you see that on the chart that

18   shows how the priority numbers are identified?

19 A.   Yes, I do.

20 Q.   Do you know how many priority 2 problems as you

21   sit here today are still open?

22 A.   No, I do not.

23 Q.   In preparing your testimony for this docket, did

24   you make any attempt to understand or assess how

25   many priority 2 problems existed in the system

1   that were still open?

2   A.   No.

3   Q.   If you could look, please, at the problem on page

4   12 that is identified as problem No. 57.

5   A.   Okay.

6   Q.   Now, does that problem identify the problem we

7   previously discussed about 865s?

8   A.   Yes, it does.

9   Q.   And are you aware of the fact that AT&T is indeed

10   experiencing problems as it relates to the receipt

11   of late 865s?

12   A.   As of Tuesday last week, I became aware of that,

13   yes.

14   Q.   And are you referring to our deposition?

15   A.   No, I am not. I'm referring to a meeting I had

16   with AT&T the day after.

17   Q.   Prior to Tuesday of last week were you aware of

18   the fact that AT&T was experiencing problems with

19   late 865s?

20   A.   No, I was not.

21   Q.   Would you agree with me if AT&T is not timely

22   notified of completion of its orders, we will be

23   unable to service customers that may call and

24   require assistance with their accounts?

25   A.   I would agree with that, yes.

1   Q.   And would you agree with me that until AT&T

2   receives notice of completion of its orders, it

3   will be unable to properly or accurately bill the

4   customers for usage during that time?

5   A.   That one I'm not sure if I agree with or not

6   because the usage, the problem that we're having

7   with the 865 is that the Legacy systems are not

8   posting the orders in a timely fashion. So all

9   orders are being posted erratically. And then

10   when the orders do post, billing is predated to

11   the actual order completion date. And that's when

12   the 865 is sent. So all usage and stuff is

13   predated and sent. So I don't think it affects

14   the ability to bill the customer.

15   Q.   But if you know, do you know if AT&T is able to

16   identify a customer as its customer in its own

17   systems until it receives Ameritech's 865?

18   A.   That I believe they can't unless they can look at

19   the daily usage and see if they have usage for the

20   customer.

21   Q.   According to this log, that problem was

22   prioritized by Ameritech as a priority 3 problem;

23   is that correct?

24   A.   That is correct.

25   Q.   And according to this log, that problem was not

1   closed as of the run date of this log which is

2   2/26/97; is that correct?

3   A. That is correct.

4   Q. If AT&T does not receive notification of order

5   completion through receipt of an 865, would you

6   agree with me that AT&T would be unable to respond

7   to a request for repair if the customer would call

8   AT&T and ask for that?

9   A. I believe that would be the case, yes.

10 Q. Let me hand you what we'll mark, Mr. Rogers, as

11   Exhibit No. 8.

12   (Exhibit 8 marked.)

13   MS. MARSH: For the record Exhibit No. 8

14   is an Ameritech document entitled all resale bugs

15   not fixed. The run date of the document is

16   February 17th, 1997.

17 BY MS. MARSH:

18 Q. Mr. Rogers, can you identify Exhibit No. 8 for the

19   record?

20 A. Just as you described it, first time I saw it was

21   in my deposition.

22 Q. The first time you saw this exhibit was during

23   your deposition last Monday?

24 A. That's correct.

25 Q. Is it fair to say then you did not review this

1   document in connection with the testimony that you

2   prepared here today?

3 A. Counsel, I'm not sure whether this document is one

4   that was created simply from a data request or one

5   that's routinely created. But, no, I did not.

6 Q. Can you identify the type of information that is

7   compiled on this document?

8 A. No more than the document describes.

9 Q. So other than just reading the document, you can't

10   provide us with any independent information about

11   the data that is contained herein?

12 A. No, I can't.

13 Q. Do you know who prepared this document?

14 A. I would believe it would have to be somebody

15   within my development organization.

16 Q. So you can verify for us that this is an Ameritech

17   generated document?

18 A. I believe that during deposition you alluded that

19   it was provided as a data request, so I'm assuming

20   that we did. I can't definitively say because I

21   was not involved with this, provide this as a data

22   request, assuming we did create it.

23 Q. Do you know the status of the various bugs that

24   are identified on the document?

25 A. No, I do not.

1   Q. Do you know if these resale bugs have been fixed

2   or are currently still not fixed as represented on

3   the document?

4   A. These are the bugs that are in the MORTEL system,

5   and I have asked my people how many of these or

6   not how many of these but how many bugs are still

7   existing in the MORTEL based on the myriad of

8   different reports that I saw on Tuesday. And

9   that's when they alluded to me it was just a

10   handful.

11 Q. There are a handful?

12 A. There are a handful of bugs that are still open.

13 Q. There are a handful of bugs that are still open in

14   the MORTEL system?

15 A. That is correct.

16 Q. Can you identify which bugs those are?

17 A. No, I cannot.

18 Q. Can you define or describe those bugs for us?

19 A. The only one I know for sure is the issue with the

20   865. And that has more to do with the Legacy

21   systems than the MORTEL system.

22 Q. Now, I think you said earlier that the MORTEL

23   system is a system that is under your direct

24   responsibility and control; is that correct?

25 A. Yes, it is.

1   Q.   Do you know how the bugs that are described on

2   this document were prioritized?

3   A.   No, Counsel, I do not.

4   Q.   Do you know if the indication of the word open

5   under the status column indicates that the bugs

6   identified in this were still open at least as of

7   February 17th, 1997?

8   MR. DAWSON: Before you answer that,

9   since this is not your document, I'll ask you to

10   look in the upper right-hand corner of the

11   document itself which provides that information.

12   MS. MARSH: Which information are you

13   referring to?

14   MR. DAWSON: Resale log prior to 1/1/97.

15   MS. MARSH: I'm referring to the

16   information in the status column, Mr. Rogers,

17   where a number of them indicate open. The run

18   date of this document the way I read it is

19   February 17th, 1997.

20   BY MS. MARSH:

21   Q.   My question is do you know if in fact all those

22   that are indicated to be open on this log were in

23   fact still open as of February 17th, 1997?

24   A.   I don't know anything more than what is on this

25   report.

1   MR. DAWSON: I'm going to object to the

2   last question, Your Honor, because it presumes

3   that the items identified as open were opened as

4   of February 17th as the document itself says it

5   reflects status prior to 1/1/97. And I know

6   nothing more than what the document says.

7   MS. MARSH: It's Ameritech's document,

8   and Mr. Rogers can't address it either. I'm just

9   trying to elicit information as to what he relied

10   on and reviewed in connection with this system

11   which he has testified was under his direct

12   responsibility and control.

13   EXAMINER JAMES: Seeing as the witness

14   has said he doesn't know, I don't see that the

15   question needs to be stricken.

16   BY MS. MARSH:

17   Q.   Mr. Rogers, does Ameritech resell ISDN services?

18   A.   I believe we do.

19   Q.   Has Ameritech provided CLECs with specifications

20   for the purpose of ordering ISDN services?

21   A.   I don't believe the specifications are any

22   different than the ones for ordering -- as far as

23   the interface specifications, they're the same

24   specifications.

25   Q.   As which ones?

1   A.   As the -- in the electronic service ordering.

2   Q.   Has any CLEC ordered ISDN services?

3   A.   Not to my knowledge.

4   Q.   Has Ameritech provided any specifications,

5   specific specifications for the purposes of

6   ordering DID trunks?

7   A.   Specific specifications? Not to my knowledge.

8   Q.   Has Ameritech provided any specifications which

9   specifically address the ordering of Centrex

10   services?

11   A.   You're talking specific, all of them are included

12   in the electronic service order guide. I don't

13   believe there are specific specifications for

14   different product.

15   Q.   Is it your opinion that a CLEC could order today

16   DID trunks?

17   A.   Using the electronic interface could they, yes,

18   they could.

19   Q.   Which interface would they rely on?

20   A.   The EDI interface.

21   Q.   And do you have any knowledge of any CLEC having

22   difficulty in fact ordering DID trunks on the EDI

23   interface?

24   A.   Not to my knowledge.

25   Q.   Are you familiar with AT&T's concept of an

1   unbundled network platform?

2   A.   Vaguely.

3   Q.   And is AT&T able today to order an unbundled

4   network platform on Ameritech's automated

5   interfaces?

6   A.   Using the Ameritech --

7   Q.   Using the AT&T concept of the platform?

8   A.   The ability to order unbundled components of the

9   unbundled network elements recombined to do the

10   same, the platform can be done on the EDI

11   interface for the line side, and then on the trunk

12   side it would be the ASR interface. The concept

13   of the way AT&T proposed ordering it, I don't

14   believe so.

15 Q.   That cannot be done today?

16 A.   We don't even understand it.

17 Q.   All right. Could AT&T order a common transport on

18   a per minute of use basis on using Ameritech's

19   interfaces today?

20 A.   That would be the ASR interface, yes.

21 Q.   Is anybody ordering, currently ordering that

22   element?

23 A.   I do not believe so, no.

24 Q.   But is it your testimony here today that Ameritech

25   could and would accept an order for common

1		transport on a per minute of use basis?
2	A.	Counsel, I'm not that familiar with the product,
3		so I can't -- I don't really know about the per
4		minute of use, whether that's the way it was
5		defined or what. But from the aspect of being
6		able to order unbundled transport, yes. I can't
7		get into the product definitions because that's
8		not my area of expertise whether or not it is per
9		minute use or what.
10	Q.	Would you agree with me there is a difference in
11		ordering transport that is shared or dedicated as
12		opposed to transport that is traffic specific on a
13		per minute of use basis?
14	A.	Counsel, the only definition I know of transport
15		was -- I mean that I use in the interface piece
16		was the definition of using the same facilities.
17		And in that case there is no difference between
18		the common transport and separate transport except
19		for billing issue.
20	Q.	Is any CLEC today currently ordering unbundled
21		local switching?
22	A.	No, they are not.
23		EXAMINER JAMES: Off the record.
24		(Discussion off the record.)
25		EXAMINER JAMES: We will recess until

1   12:45.

2   (Lunch recess taken.)

3   EXAMINER JAMES: We're back on the

4   record. Ms. Marsh, you can start.

5   MS. MARSH: Thank you.

6   BY MS. MARSH:

7   Q.   Mr. Rogers, I'd like to turn our attention now to

8   the maintenance and repair interface. Can you

9   tell me if there are currently any CLECs who are

10   relying on the maintenance and repair interface to

11   process requests for maintenance and repair

12   automatically?

13   A.   No, there are not.

14   Q.   So of the current CLECs who need to request

15   maintenance repair, are they doing that by manual

16   processes at the present?

17   A.   Yes, they are.

18   Q.   And what does that manual process entail?

19   A.   The telephone call to customer response unit in

20   Milwaukee.

21   Q.   Have any CLECs committed to any plans to begin

22   using the automatic maintenance repair interface

23   in the future?

24   A.   I believe AT&T is the only one we've been in

25   discussion with to use for sure.

1	Q.	Do you know why, for instance, USN has chosen to
2		rely on a manual process as opposed to a automatic
3		process for maintenance and repair?
4	A.	I believe it's business related. Until you have a
5		critical mass of lines, the volume doesn't justify
6		mechanization, but I can't speak to the absolute
7		reason that they use it.
8	Q.	Have any CLECs tested the mechanized interface for
9		maintenance and repair?
10	A.	No, they have not.
11	Q.	Turning finally to the billing interface, can you
12		tell me is AT&T currently relying on the billing
13		interface for receipt of electronic information as
14		regards to billing?
15	A.	I believe they are, yes.
16	Q.	And are other CLECs likewise relying on the
17		electronic billing interface?
18	A.	Yes, they are.
19	Q.	Can you identify for me the CLECs who are using
20		electronic interface?
21	A.	I can't give a definitive list. I can do the best
22		I can. One Stop, USN Communications, Metropolitan
23		Fiber, Millennium Group. I'm sorry, those are the
24		only ones that come to mind.
25	Q.	Are you aware of any problems that AT&T has

1   experienced with the electronic information that

2   has been forwarded to it over the last three

3   months as it relates to billing?

4   A. I became aware of a problem with the filing of Mr.

5   Connolly's testimony last week is the first I

6   heard that there was a problem.

7   Q. Prior to your review of Mr. Connolly's testimony,

8   did anybody in your organization inform you there

9   was a problem with the electronic information

10   being provided by Ameritech to AT&T as it relates

11   to billing?

12 A. No, they did not.

13 Q. Is it your understanding that the information

14   being provided to AT&T is inaccurate and out of

15   balance as it relates to billing?

16 A. That is what was in Mr. Connolly's testimony, but

17   we have not been able to definitively prove or

18   disprove that since the time we got the affidavit.

19 Q. I'm sorry, from -- since the time you got --

20 A. Since Thursday, since we got it.

21 Q. Are you aware of any independent efforts besides

22   the efforts that you've taken in response to Mr.

23   Connolly's testimony that Ameritech has taken to

24   address problems between AT&T and Ameritech as it

25   relates to billing?

1	A.	No, I'm not directly involved with any of those.
2	Q.	Did you make any inquiries to anybody within your
3		organization prior to your filing of your prefiled
4		testimony in this docket about the operational
5		readiness of the billing interface?
6	A.	Yes, I did.
7	Q.	And did anyone in your organization advise you of
8		any problems as it relates to CLEC reliance on the
9		electronic billing interface?
10	A.	The billing interface is outside of my direct
11		responsibility, but people who interface with the
12		billing people have not -- did not allude that
13		there was any problems. When I asked what is the
14		status of the different interfaces, what are the
15		-- what kind of outstanding problems would cause
16		the CLEC not being able to function as a business,
17		I didn't get any.
18	Q.	Are you familiar with the letter from Brooks Fiber
19		that Mr. Connolly attached to his testimony in
20		which --
21	A.	Yes, I am.
22	Q.	And are you familiar with Brooks Fiber's
23		complaints in that letter regarding its receipt of
24		a paper format bill which made it impossible for
25		it to verify the accuracy of the billing

1   information?

2   A.   Yes, I am.

3   Q.   And prior to your review of that letter as

4   attached to Mr. Connolly's testimony, were you

5   aware of that problem?

6   A.   Yes, I was.

7   Q.   And how did you become aware of that problem?

8   A.   That came into play, I can't remember exactly why

9   we got a copy of this, but we investigated and

10   found out that there were indeed tapes being made

11   for Brooks on that, but they just weren't

12   processing for some reason. We went to find out

13   why they weren't getting electronic ones, and

14   actually they were getting electronic and paper.

15   I think today they are still getting both.

16   Q.   Are you aware of any other CLEC complaints as it

17   relates to the receipt of billing information

18   that's difficult to verify and process?

19   A.   No, I am not. Let me correct that. I am not

20   aware of any that have said that -- there is a

21   problem with the data we're providing. There are

22   some who would like it in different formats and

23   different things since they can't, unless it's in

24   their format, they can't process it. But as far

25   as the ability to process what we have, no, I have